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Litigation + Business

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd Chief Clerk / Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, SC 29210

Re: Application of Duke Energy Carolinas, LLC for Approval of Pay As You Go

Pilot Program - Docket No. 2015-136-E

Dear Ms. Boyd:

Pursuant to S.C. Code Ann. Regs. 103-825 and all other applicable statutes and regulations, Duke Energy Carolinas, LLC (the "Company") requests the Public Service Commission of South Carolina (the "Commission") issue an order permitting the Company to increase the participation limit of the Prepaid Advantage Program (the "Pilot") to 6,000 customers and to extend the Pilot through May 31, 2019. Because the Pilot is currently scheduled to terminate on December 31, 2018, the Company respectfully seeks expedited consideration of this request.

In Order No. 2017-756, the Commission approved an increase in the Pilot's participation limit to 4,000 customers. The Pilot has been experiencing favorable growth and, with approximately 3,400 current enrollees, the Company is again approaching the Pilot's participation limit. In order to accommodate continued customer interest and to allow for organic growth in the Pilot, the Company requests an increase in the participation limit to 6,000 customers. Such will ensure the Company does not have to turn away interested customers during the extension period.

The Commission previously granted extensions of the Pilot on June 21, 2017, December 20, 2017, and June 7, 2018. Without a further extension from the Commission, the Pilot is currently scheduled to end on December 31, 2018. In the Company's recent base rate application in Docket No. 2018-319-E, it seeks approval to remove its Prepaid Advantage program from pilot status and to remove the customer participation limit, and seeks an effective date of June 1, 2019 for these changes. In order to allow the Company to continue serving customers who have elected to participate in the Prepaid Advantage Program rider, the Company requests an extension of the Pilot through May 31, 2019.

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The Company proposes no other changes to the tariff except to extend the availability of the rider and to increase the participation limit. The Company does not propose to change the Pilot's existing terms and conditions. Because this request does not require a determination of the entire rate structure of the Company or its overall rate of return, consistent with S.C. Code Ann. § 58-27-870(F), the Company suggests that neither notice to the public nor a hearing is required.

As noted above, because the Pilot is scheduled to terminate on December 31, 2018, the Company respectfully seeks expedited consideration of this request. Please feel free to contact me should you have any questions or concerns.

Kind regards,

Sam Wellborn

SJW:tch

cc: Jeffrey M. Nelson, ORS Chief Legal Officer (via email)

Heather Shirley Smith, Deputy General Counsel (via email)

Rebecca J. Dulin, Senior Counsel (via email)